

Hazardous Waste Generator RCRA Inspection Checklist

Site Name:

Site Location:

Mailing Address:

EPA ID #: Phone #:

Is the site within a wellhead protection area, Merrimack or Connecticut River Watershed?

Industry Representative(s):

Address Correspondence to:

Company President:

Property Owner:

Past Ownership & Activity (years at site, name change, etc.):

No. of Employees: No. of Shifts: Shift Hours:

Prior Inspections:	Air	N/A	Previous Enforcement Actions:	Air	N/A
	Water	N/A		Water	N/A
	Waste	N/A		Waste	N/A

Inspection Date: Facility Type:

DES Inspectors:

Lead Inspector's Signature:

Date:

I. PRE-INSPECTION MEETING:

A. FACILITY PERMITS, TREATMENT/ DISPOSAL

Permits Issued (waste, water, and air):

Variances / Waivers:

Site: EPA ID#: Date: Init: _____

Underground Storage Tanks:

1. **Where does the facility receive its water supply?**

2. **Does the facility discharge to a sewer system?**

If yes:

- a) **What POTW accepts the discharge?**

- b) **What industrial wastes are discharged?**

- c) **Is the facility in compliance with the local sewer ordinance? (any analysis, etc.)**

- d) **Are pretreatment standards (if any) met?**

3. **Does the facility have any industrial discharges to a septic system or drywell?**

4. **Does the facility treat any wastes on site?**

5. **Does the facility have any transformers or capacitors on site?**

- a) **How old are the transformers or capacitors?**

- b) **Do they contain PCB's?**

6. **Does the facility have an elementary Neutralization Unit/ Wastewater Treatment Unit (ENU/ WWTU)? {Env-Wm 353.04}**

If Yes:

- a) **Has the company filed a notification form?**

- b) **Has a Limited Permit been approved?**

- c) **Does the facility comply with the Limited Permit requirements?**

Site: EPA ID#: Date: Init: _____

B. GENERAL INFORMATION (PROCESS DESCRIPTION, ETC.)

II. FACILITY TOUR:

A. STORAGE PRACTICES

- | | |
|--|---|
| 1. How are wastes stored? | <div style="background-color: yellow; border: 1px solid black; padding: 2px; display: inline-block;">Containers</div> |
| 2. Are wastes stored outside? <i>{Env-Wm 509.02(c)}</i> | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| a) If so, is a barrier present? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| b) If so, is access to area controlled? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| c) If so, is a sign restricting entry by unauthorized personnel present? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| d) If containers are stored outside, are the following conditions evident: <i>{Env-Wm 507.01(e)}</i> | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| i. Are the containers kept covered; and | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| ii. Are any surface waters within 50 feet of the containers? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| 3. Does the facility utilize the following storage options: | |
| a) Small quantity generator extended storage? <i>{Env-Wm 508.03}</i> | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| b) Full quantity generator satellite storage? <i>{Env-Wm 509.03}</i> | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| 4. Does the facility utilize designated hazardous waste storage areas? | <div style="background-color: yellow; border: 1px solid black; height: 25px; width: 100%;"></div> |
| 5. Tanks: <i>{Env-Wm 509.02(a)(7), adopted 40 CFR Part 265 Subpart J}</i> | |
| a) Is there evidence of leaks/ ruptures/ spills? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| b) Are there signs of corrosion (<i>check valves</i>)? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| c) Is there adequate freeboard for uncovered tanks? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| d) Are there controls to provide for continuous inflow and means to stop outflow? | <div style="background-color: yellow; border: 1px solid black; height: 15px; width: 100%;"></div> |
| 6. Storage location: <i>{Env-Wm 506.01}</i> | |
| a) Does storage/ location pose a potential threat to human health or the environment? | <div style="background-color: yellow; border: 1px solid black; height: 25px; width: 100%;"></div> |

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7. Labeling: {Env-Wm 507.02(a), Env-Wm 507.03(a)(1), Env-Wm 507.03(a)(2)/ Env-Wm 509.02(a)(4)}

Hazardous Waste Storage Area						
a) Is hw shipped off-site within 90 days of the doa? Env-Wm 507.02(a)						
b) Are doa marked? Env-Wm 507.03(a)(1)a						
c) Are the words "hazardous waste" marked? Env-Wm 507.03(a)(1)b						
d) Are words that identify the contents marked? Env-Wm 507.03(a)(1)c						
e) Are the EPA or State waste numbers marked? Env-Wm 507.03(a)(1)d						
f) Are hw labels unobscured and accessible? Env-Wm 507.03(a)(2); Env-Wm 509.02(a)(4)						

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8. Containers: {Env-Wm 507.01, Env-Wm 509.02(a)(6)}

Hazardous Waste Storage Area							
a)	Signs of leaks? Env-Wm 507.01(a)(2)						
b)	Signs of heat and/or pressure? Env-Wm 507.01(a)(2)						
c)	Signs of corrosion/ poor condition? Env-Wm 509.02(a)(6)						
d)	Bungs and lids closed and sealed? Env-Wm 507.01(a)(3)						
e)	Stored on impervious surfaces? Env-Wm 507.01(b)						
f)	Floor drains or manholes present? Env-Wm 507.01(c) Env-Wm 509.02(a)(4)						
i.	If yes, is secondary containment (2 ^o) present? and						
ii.	Is 2 ^o capable of containing the volume of the largest container?						

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B. PREPAREDNESS AND PREVENTION

{Env-Wm 509.02(a)(4), adopted 40 CFR Part 265, Subpart C}

1. Testing and maintenance of equipment:

2. Adequate aisle space between containers: *(not less than 2 feet)*

3. Arrangements with local authorities:

a) Plant layout;

b) Properties of hazardous waste.

4. Hazardous waste storage area emergency equipment {CFR 509.02(a)(4), CFR 509.02(b)}

Hazardous Waste Storage Area						
a) Alarm/ internal communication?						
b) Telephone/ 2-way communication?						
c) Portable fire control equipment?						
d) Spill control/ decontamination equipment?						
e) Adequate water for fire control?						
f) Emergency measures posted at the nearest telephone? *						

Note: All items must be within 100 feet of each hazardous waste storage area.

* Home and office phone number(s) of emergency coordinators, phone numbers of fire, police, hospital and response personnel, and location of fire extinguisher, spill control material and alarms.

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C. EMERGENCY MEASURES

1. Is the emergency coordinator available at all times to respond to emergencies? *{Env-Wm 508.03(d), 40 CFR 265.55}*
2. Are the steps to be followed in the event of an emergency posted at the nearest telephone including: *{Env-Wm 508.03(e), Env-Wm 509.02(b)}*
 - a) The home and work telephone number for the emergency coordinator?
 - b) The telephone number for the local police, fire department and hospital as well as any local or state response teams; and
 - c) The location of fire extinguisher, fire alarms and spill control.
3. Are all employees familiar with emergency and proper waste handling procedures? *{Env-Wm 508.04(c)}*

D. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCAPATIBLE WASTES *(REQUIRED OF ALL GENERATORS) {Env-Wm 509.02(a)(3), 40 CFR Part 265.17}*

1. Separation of ignitable, reactive and incompatible wastes?
2. "No Smoking" signs near ignitable and reactive wastes?

E. SMALL QUANTITY GENERATOR EXTENDED QUANTITY AND STORAGE PROVISION REQUIREMENTS *{Env-Wm 508.03}*

1. Are weekly inspections conducted and documented for containers?
2. Are tanks inspected on a daily basis?
3. Are containers under the management of a designated hazardous waste manager emergency coordinator or their designee?
4. Does the quantity of wastes accumulated on-site exceed 1000 kg?

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F. FULL QUANTITY GENERATOR SATELLITE STORAGE PROVISION REQUIREMENTS {Env-Wm 509.03}

1. Are the containers under the control of the process operator?
2. Has the process operator been trained?
3. Upon reaching the 55-gallon or 1-quart maximum is the following being done:
 - a) The fill date is marked or labeled on the container; and
 - b) The wastes are shipped off-site within 90 days of the fill date.
- 4) Subsequent to reaching the 55-gallon or 1-quart maximum at the point of generation, is the following done:
 - a) The accumulated waste is moved to a designated hazardous waste storage area; or
 - b) Any additional accumulated waste containers are marked with the initial fill date and shipped off-site within 90 days of this date.

G. MISCELLANEOUS INFORMATION

1. Are there any surface waters in the proximity?
2. Is there potential for an imminent hazard, air or water discharge violation?
3. Is soil or groundwater contamination detected? {Env-Wm 506.01(c)}

If so, are the requirements of Env-Wm 702.14 met?

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4. Were any photographs taken?

If so, which camera was used?

Photographer?

PHOTO	SUBJECT

H. RECORDS

1. Inspection Requirements: {Env-Wm 509.02(a)(1), adopted 40 CFR Part 265.15 General inspection requirements; Env-Wm 509.02(a)(6), adopted 40 CFR Part 265 Subpart I - Use and Management of Containers; and Env-Wm 509.02(a)(7), adopted 40 CFR Part 265 Subpart J - Tank Systems}

- a) Are wastes placed in tanks or containers or both?
- b) Are hazardous waste inspections conducted?
- c) Is there a written inspection schedule?
{40 CFR 265.15(b)(1)}
- d) Is there a log or checklist used to record inspections? {40 CFR 265.15(d)}

e) Does the inspection log include:

- i. Frequency of inspections?
(containers- weekly, tanks- daily)
- ii. Notation for observing leaks?
- iii. Notation for observing deterioration due to corrosion or other factors?
- iv. Date and time of inspection?
- v. Name of the inspector?
- vi. Notation of observations? and
- vii. Date & nature of repairs or remedial actions?

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2. Personnel Training: *{Env-Wm 509.02(a)(2), adopted 40 CFR Part 265.16 Personnel training}*

- | | |
|---|--|
| a) Is there a Personnel Training program available for review? | |
| b) Is training completed? | |
| c) Does the instructor have documentation of training in hazardous waste management?
<i>{40 CFR 265.16(a)(2)}</i> | |
| d) Are facility personnel trained within six (6) months of employment or assignment to a new position, and not permitted to work in unsupervised positions until trained? <i>{40 CFR 265.16(b)}</i> | |
| e) Does the training program ensure that facility personnel can effectively respond to emergencies?
<i>{40 CFR 265.16(a)(3)}</i> | |
| f) Are annual reviews conducted for personnel handling hazardous waste? <i>{40 CFR 265.16(c)}</i> | |

Employee Name	Job Title/ Haz. Waste Duties	Date of Training

g) Is the following documentation maintained:

- | | |
|---|--|
| i. The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?
<i>{40 CFR 265.16(d)(1)}</i> | |
| ii. A written job description, including requisite skills, education and duties, for positions with hazardous waste management duties?
<i>{40 CFR 265.16(d)(2)}</i> | |
| iii. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position with hazardous waste management duties?
<i>{40 CFR 265.16(d)(3)}</i> | |
| iv. Documentation that training has been completed?
<i>{40 CFR 265.16(d)(4)}</i> | |

Site: [REDACTED] EPA ID#: [REDACTED] Date: [REDACTED] Init: _____

h) Are records kept at the facility until closure for current employees and for 3 years from date of last employment for past employees? {40 CFR 265.16(e)} [REDACTED]

3. Contingency Plan: {Env-Wm 509.02(a)(5), adopted 40 CFR Part 265, Subpart D - Contingency Plan and Emergency Procedures}

a) Is a plan maintained at the facility? {40 CFR 265.53(a)} [REDACTED]

b) Is up-to-date information on all persons qualified to act as emergency coordinator maintained in the plan, including: {40 CFR 265.52(d)}

- i. Names, noting the primary emergency coordinator? [REDACTED]
- ii. Home and office phone numbers? [REDACTED]
- iii. Home and office addresses? [REDACTED]

c) Is the emergency coordinator familiar with all aspects of the plan, facility, operations and wastes? {40 CFR 265.55} [REDACTED]

d) Does the emergency coordinator have the authority to commit the resources necessary to carry out the plan? {40 CFR 265.55} [REDACTED]

e) Does information on emergency equipment, documented in the plan, include: {40 CFR 265.52(e)}

- i. The location of equipment? [REDACTED]
- ii. A physical description of each item? and [REDACTED]
- iii. A brief outline of equipment capability? [REDACTED]

f) Does the evacuation plan, documented in the plan, include: {40 CFR 265.52(f)}

- i. Description of signal(s) used to begin evacuation? [REDACTED]
- ii. Describe/ show evacuation routes? and [REDACTED]
- iii. Alternate evacuation routes? [REDACTED]

g) Are arrangements with local authorities described? {40 CFR 265.52(c)} [REDACTED]

h) Have copies of the plan been submitted to local authorities (police, fire, hospitals, contractors, and state and local emergency response teams)? {40 CFR 265.53(b)} [REDACTED]

i) Are provisions made in the plan that, in the event of an emergency, the emergency coordinator will: [REDACTED]

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- | | | |
|-------|---|--|
| i. | Activate internal facility alarms? {40 CFR 265.56(a)(1)} | |
| ii. | Notify appropriate state or local authorities if their help is needed? {40 CFR 265.56(a)(2)} | |
| iii. | Immediately identify the character, exact source, amount, and a real extent of any released materials? {40 CFR 265.56(b)} | |
| iv. | Assess possible hazards to human health or the environment as a result of the emergency situation? {40 CFR 265.56(c)} | |
| v. | Notify local authorities if an evacuation is needed? {40 CFR 265.56(d)} | |
| vi. | Immediately notify the division at (603) 271-3899 (during working hours 8:00 ^{am} - 4:00 ^{pm}) or the New Hampshire Department of Safety Hazmat Unit at (800) 346-4009 (24 hrs./day) if human health or the environment is threatened? {Env-Wm 513.01(a)(2)} | |
| vii. | Immediately notify either the local fire chief or the National Response Center at (800) 424-8802? {40 CFR 265.56(d)(2)} | |
| viii. | Address in the above notifications all vital information as listed in 40 CFR 265.56(d)(2): | |
| | Name and telephone number of reporter? | |
| | Name and address of facility? | |
| | Time and type of incident? | |
| | Name and quantity of material(s) involved? | |
| | Extent of injuries? and | |
| | Possible hazards to human health or the environment, outside the facility? | |
| ix. | Take all reasonable measures to ensure that fires, or releases of hazardous waste will not spread (by halting operations, etc.)? {40 CFR 265.56(e)} | |
| x. | Monitor equipment if there is a work stoppage? {40 CFR 265.56(e)} | |
| xi. | Provide for the treatment, storage or disposal of hazardous waste resulting from the emergency? {40 CFR 265.56(g)} | |
| xii. | Ensure that a waste which is incompatible with the released material is not treated, stored or disposed of until cleanup procedures are completed? {40 CFR 265.56(h)(1)} | |

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- xiii. Provide that all equipment has been cleaned and is fit before resumption of operations?
{40 CFR 265.56(h)(2)}
- xiv. Notify state and local authorities that the facility is in compliance with 40 CFR 265.56(h)(1) & (2) before resumption of activities {40 CFR 265.56(i)}
- xv. Submit a written report to the Waste Management Division within 15 days that addresses all details of the incident as listed in 40 CFR 265.56(j):

Name, address and telephone number of the owner or operator?

Name, address and telephone number of the facility?

Date, time and type of incident?

Name and quantity of material(s) involved?

Extent of injuries?

An assessment of actual or potential hazards to human health or the environment? and

Estimated quantity and disposition of recovered material that resulted from the incident?

4. Manifests:

- a) Are all required parts completed? {Env-Wm 510.03(9)}
- b) Are there any incorrect shipping names, numbers?
{Env-Wm 510.03}
- c) Are copies distributed correctly? {Env-Wm 510.02}
- d) Are all required documents held for three years?
{Env-Wm 512.01}
- e) Recent manifests/ frequency of shipments: (according to DES Reporting Section manifest files)

Date	Manifest #	Wastes

Site: EPA ID#: Date: Init: _____

5. Does the company export hazardous waste? {Env-Wm 510.06}

- a) If so, are EPA "Acknowledgments of Consent" on file?
- b) Are copies sent with each manifest?

6. Manifest Review:

Date	Manifest #	Waste Code	Wastes (Amount)	TSD

J. HAZARDOUS WASTE PROFILE (based on 01-93 to 12-93 annual activity report)

Type of Waste	EPA Waste #	lb./Mo.	Transporter	Off-site TSD

K. HAZARDOUS WASTE DETERMINATION {Env-Wm 502.01}

L. USED OIL MANAGEMENT

1. Does the facility generate used oil?

2. Is the used oil being recycled?

3. Has the used oil been tested? {Env-Wm 807.06(b)(7)}

Site: EPA ID#: Date: Init: _____

4. Are analytical results available for review?

5. Which of the following is the waste stream classified as:

- a) Specification Used Oil; {Env-Wm 807.02}
 - b) Off-specification Used Oil; {Env-Wm 807.03}
 - c) Oil classified as hazardous waste. {Env-Wm 807.04}

6. If the oil is classified as a hazardous waste and subsequently burned for energy recovery, is it managed as a hazardous waste fuel per Env-Wm 806?

7. Is the used oil stored in tanks or containers? (indicate tank capacity if applicable) {Env-Wm 807.06(b)(2)}

8. Are all containers and/or tanks marked with the words "Used Oil for Recycle"? {Env-Wm 807.06(b)(4)}

9. Are the containers or tanks kept closed at all times except when material is actually being added or removed? {Env-Wm 807.06(b)(5)}

10. Is the used oil shipped off-site? If yes, how?

11. Are copies of all bills of lading and analytical results retained on-site for three years? {Env-Wm 807.06(b)(17)}

12. Is the generator a "used oil marketer"? {Env-Wm 807.08}
 - a) If yes, have they notified the DES and EPA of their used oil activities? {Env-Wm 807.09(b)(1)}
 - b) Is there a batch specific code on all pertinent copies of the analytical results, manifests and bills of lading? {Env-Wm 807.09(b)(4)}

Comments:

Site: EPA ID#: Date: Init: _____

- c) Has the receiving burner or marketer notified the DES or EPA of its used oil management activities and is proof of this notification retained by the shipping marketers? {Env-Wm 807.09(b)(11)}

Comments:

III. POST INSPECTION MEETING:

A. ATTENDED BY:

B. REVIEW:

C. DOCUMENTS RECEIVED AT INSPECTION:

1. By DES personnel:

2. By the company:

Site EPA ID#: Date: Init: _____

D. ENFORCEMENT PROCEDURES:

Does generator understand enforcement procedures? (LOI, LOD, AO, RFE)

E. LAND BAN:

1. Does the generator understand land disposal restrictions?

2. Do they apply to the generator?

F. POLLUTION PREVENTION:

1. Does the facility have a formal pollution prevention policy?

2. Referred to the NH Pollution Prevention Program {NHPPP @ 1 (800) 273-9469}?

G. REQUESTS FOR INFORMATION:

Information Requested by State from Facility	Date Requested by	Date Received

Information Requested by Facility	Date Sent